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December 2, 2021

**Via ECF**

The Honorable Paul Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Sattyakam et al v. Aron Security, Inc et al*  
Case No.: 21-cv-03485-PGG-RWL

Dear Judge Gardephe:

This firm represents Plaintiffs in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request a stay in this action, which will include a stay of Defendants' current Motion to Dismiss, the Opposition to which is currently due on December 6, 2021. Parties request this stay continue pending the completion of parties' contemplated class-mediation to be held on February 11, 2022.

After several discussions, the parties have agreed to engage in private mediation with third-party mediator, Mr. Marty Scheinman on February 11, 2022. This date is the earliest date that Mr. Scheinman, whom the parties found mutually agreeable, had available that worked for all parties and counsel involved.

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter by February 25, 2022. If the parties are unable to reach a resolution at mediation, the parties propose that they with their joint letter submit a new Scheduling Order and motion briefing schedule for this matter.

We thank Your Honor for considering our request.

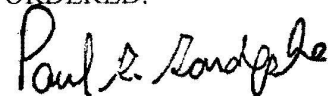
Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

/s/ Frank Giambalvo  
Frank Giambalvo, Esq.

**Memo Endorsed:** The application is granted. All pending dates and deadlines in this matter are adjourned sine die. By February 25, 2022, the parties will submit a joint letter informing the Court of the outcome of the mediation. If the parties are unable to reach a resolution at mediation, in that joint letter, the parties will propose a new briefing schedule for Defendants' motion to dismiss. If the case is to move forward, any proposed scheduling order will be addressed to Judge Lehrburger.

SO ORDERED.



Paul G. Gardephe  
United States District Judge

Dated: December 3, 2021

cc: all parties via ECF